

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERICA FEBRIANTI

Write the full name of each plaintiff.

-against-

NYC HEALTH + HOSPITALS

~~NYC~~ CITY OF New York

Write the full name of each defendant. The names listed above must be identical to those contained in Section 1.

Ammendment
Submitted on

23cv 06175

(Include case number if one has been assigned)

Jan 6
2025

Do you want a jury trial?

☐ Yes ☒ NO

No Jury
Trial

EMPLOYMENT DISCRIMINATION COMPLAINT

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

ERICA FEBRIANTI
First Name Middle Initial Last Name

HOMELESS
Street Address

County, City State Zip Code

929 615 1758
Telephone Number

ericafebrianti60@gmail.com
Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. (Proper defendants under employment discrimination statutes are usually employers, labor organizations, or employment agencies.) Attach additional pages if needed.

Defendant 1: NYC HEALTH + HOSPITALS
Name
100 Church Street
Address where defendant may be served
New York NY 10008
County, City State Zip Code

Defendant 2: ~~NYC~~ CITY OF New York
Name
100 Church Street
Address where defendant may be served
New York NY 10008
County, City State Zip Code

Defendant 3:

Name

Address where defendant may be served

County, City:

State

Zip Code

II. PLACE OF EMPLOYMENT

The address at which I was employed or sought employment by the defendant(s) is:

METROPOLITAN HOSPITAL (NYC HEALTH + HOSPITAL)
Name
1901 1ST AVE.

Address

New York

NY

10029

County, City

State

Zip Code

III. CAUSE OF ACTION

A. Federal Claims

This employment discrimination lawsuit is brought under (check only the options below that apply in your case):

- ☒ Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e to 2000e-17, for employment discrimination on the basis of race, color, religion, sex, or national origin

The defendant discriminated against me because of my (check only those that apply and explain):

☒ race:

INDONESIAN AMERICAN

☒ color:

BROWN

☒ religion:

ISLAM

☒ sex:

FEMALE

☐ national origin:

- ☐ 42 U.S.C. § 1981, for intentional employment discrimination on the basis of race.

My race is: _____

- ☒ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 to 634, for employment discrimination on the basis of age (40 or older)

I was born in the year: 1974

- ☐ Rehabilitation Act of 1973, 29 U.S.C. §§ 701 to 796, for employment discrimination on the basis of a disability by an employer that constitutes a program or activity receiving federal financial assistance

My disability or perceived disability is: _____

- ☒ Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 to 12213, for employment discrimination on the basis of a disability

My disability or perceived disability is: my prayer time struggling to be accomodated

- ☐ Family and Medical Leave Act of 1993, 29 U.S.C. §§ 2601 to 2654, for employment discrimination on the basis of leave for qualified medical or family reasons

Not able to request Accomodation Under ADA

B. Other Claims

In addition to my federal claims listed above, I assert claims under:

- ☒ New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297, for employment discrimination on the basis of age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status
- ☒ New York City Human Rights Law, N.Y. City Admin. Code §§ 8-101 to 131, for employment discrimination on the basis of actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status
- ☒ Other (may include other relevant federal, state, city, or county law):

All The Laws

IV. STATEMENT OF CLAIM**A. Adverse Employment Action**

The defendant or defendants in this case took the following adverse employment actions against me (check only those that apply):

- ☒ did not hire me
- ☒ terminated my employment
- ☒ did not promote me
- ☒ did not accommodate my disability (Prediabetic) bathroom Accommodation
- ☒ provided me with terms and conditions of employment different from those of similar employees
- ☒ retaliated against me
- ☒ harassed me or created a hostile work environment
- ☒ other (specify): Respondent GIVING more opportunity to new Younger officers in terms and conditions of the employment

B. Facts

State here the facts that support your claim. Attach additional pages if needed. You should explain what actions defendants took (or failed to take) because of your protected characteristic, such as your race, disability, age, or religion. Include times and locations, if possible. State whether defendants are continuing to commit these acts against you.

See attachment

As additional support for your claim, you may attach any charge of discrimination that you filed with the U.S. Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other government agency.

IV. STATEMENT OF CLAIM

A. Adverse Employment Action

The defendant or defendants in this case took the following adverse employment actions against me (check only those that apply):

- ☒ did not hire me
- ☒ terminated my employment
- ☒ did not promote me (unfair working condition)
- ☒ did not accommodate my disability *July 07-20-2023*
- ☒ provided me with terms and conditions of employment different from those of similar employees

☒ retaliated against me

☒ harassed me or created a hostile work environment

☒ other (specify): Respondent GIVING MORE OPPORTUNITIES TO new Younger officers IN Terms ^{and} conditions of the employment

B. Facts

State here the facts that support your claim. Attach additional pages if needed. You should explain what actions defendants took (or failed to take) because of your protected characteristic, such as your race, disability, age, or religion. Include times and locations, if possible. State whether defendants are continuing to commit these acts against you.

See Attachment

As additional support for your claim, you may attach any charge of discrimination that you filed with the U.S. Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other government agency.

- ① I would like to amend the complaint on SDNY Employment Discrimination complaint on page 5 on section IV. STATEMENT OF CLAIM by adding the Adverse Employment action. I would like to tick or check the box on " *did not accommodate my disability* " (See Exhibit Z-98) and attach exhibit to this complaint. I believe I did not give the opportunity to request bathroom accommodation under ADA because I did not have the opportunity and capable to do it because of my hostility working assignment and condition due to my age.
- ② On October 2021 when Sgt Blount, Sgt Rodriguez, and Captain Melendez told me that I need to provide the doctors note for bathroom accommodation urges if I will use the bathroom every morning. I am not able to provide the doctors note because at the time I am not on prediabetic condition yet. I can't provide the doctors note and I was struggling to pray too because at the time I was assigned to midnight shift restricted post 4 main lobby and the same post on 04/09/2022. This post required relief in order to go to the bathroom and pray. My first write-up for "post abandonment" by Captain Melendez was on October 2021 because I leave the "post abandonment" to relief bathroom urges and pray.
- ③ I was on prediabetic when I used to work there on 04/09/2022. I was diagnosed prediabetic since December 2021. I did not asked for bathroom accommodation under ADA because I was assigned to post 2B most of the time. Post 2B is unrestricted post (Freedom post) and I can go to the bathroom and pray on time without required relief.
- ④ In the end of January 2022, Sgt Rodriguez said they took unrestricted Post 2B from my assignment because he removed unrestricted post 2B from the midnight shift assignment but I found out they still have post unrestricted post 2B but they assigned to another officers.
- ⑤ In the end of January 2022 I started working at midnight shift restricted post 4 main lobby permanently and I did not asked for bathroom accommodation under ADA because my religious belief accommodation to pray was struggling to be accommodated (See Exhibit A, Exhibit B, Exhibit C, Exhibit G, Exhibit N-2) and I refrained my self to asked for another bathroom accommodation under ADA because I believed by asking bathroom accommodation under ADA will swap the accommodation to pray.
- ⑥ My prayer time so important because in Islam the purpose of life is to worship ALLAH first above all..if they said they can not accommodated to pray, I cannot worked there, so my bathroom is my second choice. I need to be accommodated to pray first so I can asked for bathroom accommodation later but it was impossible they will give bathroom accommodation because my religious belief obligation to pray was struggling to be accommodated.
- ⑦ I believed I did not have the opportunity to request the bathroom accommodation under ADA because of Hostility working assignment and conditions which giving me difficulties to pray and I never had any rotating working assignment like other new officers because of my age.
- ⑧ I believed the respondent on position statement said I was failed to asked for the bathroom accommodation (See Exhibit Hadith) due to my prediabetic disability under ADA was inaccurate because I did not asked the accommodation for bathroom under ADA because I did not give opportunity to do it because my religious belief obligation was struggling to be accommodated and unfair working assignment according to my seniority rights. The respondent aware of my prediabetic condition when I

disclosed my health situation of prediabetic during EEO interview was conducted on April 13, 2022 (See Exhibit V). The interview started at 11:15 am for 50 mins and 07 seconds duration.

- ⑨ I would like to clarify to the court that the reason I did not requested the bathroom accommodation under ADA because I did not have the opportunity to requested the bathroom accommodation Under ADA because of the tension I had in my working environment because my accommodation to pray was struggling to be accommodated. I cannot work there if they do not giving me the opportunity and accommodation to pray on time.

B. Facts

- (10) See Exhibit L-2 The respondent refused to hire me as Hospital Care Investigator List: 604 because of my protected activity. I filled the religious internal complaint to Captain Melendez regarding Sgt Rodriguez (Tour 1 Commander) on February 25, 2022 (See Exhibit A) and Detective King on March 27, 2022 (See Exhibit B), March 29, 2022 (See Exhibit C), March 28, 2022 (See Exhibit G), April 07, 2022 (See Exhibit N-2), April 07, 2022 (See Exhibit F). This time frame also the same time I supposed received the letter in mail or email regarding this position. I do not received anything in mail or email regarding this position.
- (11) Also during the psychological virtual interview (Exhibit R) I was asked questions "Do you have any court proceedings" and I said yes I had discrimination lawsuit with my former employer in 2015. I disclosed my discrimination lawsuit against my former employer in court.
- (12) On 04/09/2022 I was discharged because of my religious belief. I have to walked out the post because nobody relief me to pray. From prior incident on 04/07/2022 when Detective King comeback from my internal religious discrimination allegation, Central Command officer Wood said the department not willing to accommodated early prayer time anymore and he transferred the call to Sgt Rosado and Sgt Rosado stated on the phone that Sgt Rodriguez will set me up to pray late at 0513 am (See Exhibit N-2). I told them I can't be relief at that time because I need to pray on time. I was told by Sgt Rosado that the department not willing to provide early prayer time anymore and if I walked the post I will be write-up for misconduct for leaving the post. I almost walked the post that day and Detective King came to relieved to pray at 0500 am. The department did not say she was coming. I almost walked out the post that day.
- (13) See Exhibit F, paragraph 9 On 04/07/2022 I sent email to CEO operation and hospital administration that I need permission to walked out the post if nobody relief me to pray. I did not received no reply from the CEO operation and hospital administration. I only received reply from captain Melendez that I was accommodated at 0500 am by Detective King on 04/07/2022.
- (14) I was called out on 04/08/2022 because the tension I have in my department and I still waiting the reply from CEO operation and hospital administration how to overcome the situation in my department.
- (15) (See Exhibit L-3) On 04/09/2022 I came to work and ready for the worst and nobody relief me to pray and I walked out the post in order to pray by notified Central Command Officer Jones. While I was praying I was called on the radio by Officer Martinez and I was called and forced to report to the Hospital police headquarters at 8th floor. I went upstairs and I met Sgt Rodriguez at rollcall office. Sgt Rodriguez asked me "why you leave your post" and I told him "I have to pray" and He said "this job not for you, You must choose between God or a job". I told him I choose God first and I give him my ID, Sheild, Radio, Keys. He said he didn't fired me he just want to write me up for walking out the post but I have to leave at 5 am that day and he said "go home and think and comeback tomorrow if I will choose job first". I told Sgt Rodriguez that today and tomorrow are the same thing I will choose God first. He asked me if I was resigning and I told him "I don't know" and he said "you must resign". I went downstairs to my locker room to change my clothes and comeback upstairs and I gave my bulletproof vest to Officer Wood. I was discharged that day.
- (16) (See Exhibit L-3) On 04/10/2022 I sent email to CEO operation and Hospital administration about my employment discharged.

(See Exhibit L-4) approximately On 4/14/2022 or 04/15/2022 I received the letter in the mail that my employment had been terminated Dated ON 04/12/2022

(17) I believed the respondent had discriminated based on my age. I am consider new officer but my age was older than other new officers(Officer Chapagain, Smith, McLaughlin, Gutierrez). New younger officer was treated better in terms and conditions of employment have the opportunity to grow. I did not received the same training as new younger officers. Detective King is senior officers who train new officers at midnight shift. She knew my age prior she was assigned to central command officer in the middle August 2021 during locker room conversation. At the time I didn't see any significant change in my department because she just regular officer.

(18) The condition in my department was drastically change when she was assigned to Central Command to replace Officer Phillips in October 2021. Since then she told me in order to pray I need permission from Supervisor on duty the night before and I must requested during roll call.

(19) Captain Melendez was asked me to submit the covid card which contain my age and birthday to him (See Exhibit I) even though I already told him I already submit the covid card to OHS 6th floor. I submit the card on September 24, 2021.

(20) Since then I started receiving verbal harassment from supervisors, unfair working condition(See Exhibit T), negative working performance(See Exhibit Q), denied shift preference(Exhibit C-10), denied bathroom, write up in order to pray and bathroom accommodation.

(21) My rights as woman violated when I was told Dr. Wilby that I have to hold pregnancy within 3 months in order to be hired at NYC Health+Hospitals because I must take 2 MMR vaccine in order to be hired. I was told to sign the letter of consent of the vaccine will harm the baby. I told Dr. Wilby that I had intention to be pregnant. Also I told Dr Wilby that I already took MMR vaccine during admission to college. Dr. Wilby said I must take 2 MMR vaccine in order to be hired and she said take the MMR vaccine now and comeback with another paperwork from the college.

(22) Dr. Wilby did not accommodate my intention in order to be pregnant under my free will. Dr. Wilby said if I did not to take the MMR vaccine I will not get the job. In this case I believed my intention to be pregnant is the contingency of the employment in order to be hired. Dr Wilby still insisted to take the MMR vaccine or I will not getting the job. I was force to take the MMR vaccine in order to get the job and On June 19th 2021 I was pregnant with no heartbeat(See Exhibit N-3).

(23) My rights as woman violated when I was told to tightened my belt during Hospital Police Academy after I was submitted the doctor note for June 25, 2021 of my gyn visit which had picture of the pregnant woman holding the belly on the heading note and The clinics name: Health Care For Woman OB Gyn.

(24) On June 30, 2021(See Exhibit N-5) Captain Padilla told me "IF YOU HAVE BELT LIKE THAT I WILL TAKE YOU UPSTAIRS" meaning I will dismiss from the Police Academy. Going upstairs meaning doing paperwork of my dismissal from employment.

(25) Captain Padilla instructed Detective Santa Lay to tightened my belt against my will. She took me to the bathroom and she tightened my belt against my will. Definitely I would never put my belt like that because of the baby. I was feeling congested on my belly and squeeze on my baby. When I went back to the classroom I can't breath especially when I was sitting it was squeeze my fetus more;

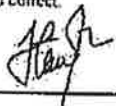

26 The respondent stated on position statement that Tighten the Belt is the part Dress Code Policy after I submitted the doctors note which contain the picture of the pregnant lady holding belly on the heading note on the left heading and Have the letter heading stated "Health Care for Women OB GYN".

27 I believed tightened the belt for woman is illegal because woman might be pregnant or bearing a child. But I was the only one was subjected to tightened my belt alone. Captain Padilla instructed all the Hospital Police candidate in my squad "every one go back to classroom except Recruit Febrianti" and I was told by Captain Padilla "IF YOU HAVE BELT LIKE THAT I WILL TAKE YOU UPSTAIRS".

28 Also, the other ladies were having big belly such as Officer Minor, and Officer Roberson but I am the only one who subjected to tightened my belt against my will by myself. I strongly believed Captain Padilla knew I was pregnant because of the doctors note I was given to them and have a picture of pregnant woman touching belly and the name of Clinics "Health Care for Women OB GYN". On the same day at 5 pm I started having vaginal bleeding and I was stay in ER for 14 hours and I was diagnose in my discharge paper as miscarriage.

29 I believed my rights as woman had been violated

EEOC Form 3 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: EEOC Agency(ies) Charge No(s): 528-2022-04761	
State or Local Agency, if any: _____ and EEOC			
Name (Indicate Mr., Mrs., Miss, Ms., Dr., Hon., Rev., and) Erica Febranti		Home Phone (929)615-1758	Year of Birth
Street Address 4454 68th Ave FLUSHING, NY 11367			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name NYC Health + Hospitals		No. Employees, Members 501+ Employees	Phone No.
Street Address 1460 Pelham Parkway WESTCHESTER, NY 10461			
Name 		No. Employees, Members 	Phone No.
Street Address 			
DISCRIMINATION BASED ON 		DATE(S) DISCRIMINATION TOOK PLACE Earliest: 07/01/2021 Latest: 07/12/2022 Continuing Action	
Age, Religion, Retaliation, Sex			
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): See Attached			
I want this charge filed with both the EEOC and the State or Local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements.	
I declare under penalty of perjury that the above is true and correct. 07-28-22  Date Charging Party Signature		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please notify EEOC or the state or local agency where you filed your charge if retaliation is taken against you or others who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an employer to discriminate against present or former employees or job applicants, for an employment agency to discriminate against anyone, or for a union to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

My name is Erica Febrianti and I am 47 years old, female, and Muslim. My date of hire for Special Officer (Hospital Police) was on May 3, 2021 which it was the first day of Hospital Police Academy. I was graduate from Hospital police academy on July 23, 2021 and started working for Special Officer (Hospital Police) On July 26, 2021.

I got this job from DCAS another city agency who manage the city civil exams. I pass both exam special officers (hospital police) and Hospital Care Investigator (List # 604) for NYC Health + Hospitals.

I believed the respondent refuse to hire me as Hospital Care Investigator because my protected activity. I met someone who her list no. 586 was hired in March, 2022. My list no. 604 should be called during March or April 2022 but nobody called me for this position while I was still on duty for Special Officer (Hospital Police). I believed NYC Health + Hospital did not want hire me because I disclosed my discrimination lawsuit against my former employer during interviewed for Special Officer position.

In or on April, 2021, I conducted online interviewed for Virtual Psychological exam determination for Special officer (Hospital Police) position at NYC Health + Hospitals. During that time, I was asked if I had any court proceedings. I disclosed that I had a lawsuit in 2015 regarding a charge of discrimination against my former employer.

In or on April 2021, I believed my rights have been violated as woman when I was told I can't be pregnant within 3 months because in order to get a job as special officer must take 2 MMR shot (Rubella-Mumps) as medical screening hiring procedure at NYC Health + Hospitals. I was told to sign the consent paper to take the risk of my health if something happened or in case if I get pregnant will cause harm for the baby.

I told the Dr Wilby that already have one MMR vaccine during my admission to college but Dr. Wilby said I must take 2 MMR vaccine for the medical screening requirement in order to get this job. She told me to take the MMR vaccine now and comeback with another paperwork from previous MMR vaccine from the college, so I don't have to take the second MMR vaccine. I was told by someone at Hospital Academy that she did not take the MMR shot for this job. Unfortunately, I was pregnant.

June 19th, 2021, I had problem with my right foot pain, and I was diagnosed I am pregnant, but the doctor said the baby no heartbeat. The doctor said it was too early to detect whether the baby alive or not and she said just wait for few weeks hopefully the baby will have a heartbeat. I didn't provide doctors note on June 19th, 2021, to hospital police academy because Hospital Academy closed in the weekend, so I don't have to provide doctors note.

June 25th, 2021, I went to gynecologist doctor to check my pregnancy and request the doctors note and I was providing doctor's note had a picture of pregnant woman on the heading note. I was told by Sonogram examiner that the baby will be due February 19, 2022, but currently the baby has No heartbeat. The doctor told me it's too early to detect and decide and she said put finger cross I have come back next week to check my pregnancy hopefully there's heartbeat. I requested the doctors note and the doctors note have a picture of pregnant lady on the letterhead.

On June 30th, 2021 I believe NYC Health + Hospital have intention to get me miscarriages when Captain Padilla asking me to tight my belt during hospital police academy after I provide doctor's note for June 25th, 2021 which had a picture of pregnant woman on heading note. Captain Padilla said "If you belt like

that I will take you upstairs" meaning I will dismiss from the academy. I saw there were other ladies on my academy have loose belt, but Captain Padilla didn't asked them to tight their belt.

On June 30th, 2021, I went to NY Presbyterian Hospital at Main street, Flushing due to Vaginal bleeding. I went there approximately between 0800-1100pm hours at waiting room. I was seen by 4 different doctors.

I was seen by 2 doctors of NY Presbyterian doctor, and they did not say I was miscarriage, and they said the baby no heartbeat but I did told them that I was told by NYC Health + Hospitals that I am not supposed to get pregnant within 3 months because I need to take 2 MMR (Rubella-Mumps) in order to get the job. The first 2 doctors send me to do sonogram approximately at 03:00 am and I was told that the baby still there and there was no sign of miscarriage.

On July 1st, 2021 approximately between 0400-0600 am I have visitor (doctor no.3) which I believed NYC Health + Hospitals personnel and she said she is a doctor came from another Hospital and she doesn't work at NY Presbyterian Hospital. She said she need to know who give the vaccine and medication. I told her that I must take the MMR vaccine in order to get the job with NYC Health + Hospitals for special officer. She asked me if this is the happy baby and I told her Yes I want this baby, but I did asked her if possibility this baby can breathe again in future or should I get rid of this baby and make a new baby but at the time I was confused because I am not sure what should I do but I told the doctor that I will wait and pray maybe the baby will breathe again in the future but she said she will bring gynecologist doctor (Doctor 4) to check my pregnancy. I told her I will wait and hope the baby will have heartbeat in the future. She said she will not do anything and check whether if we should keep the baby or not.

From my experience during my pregnancy, the doctors never touch my vagina or do vaginal examination down there. They usually do sonogram to check the baby and rub my belly gently but the last doctor (doctor no. 4) she did put her finger on vaginal and one drop of the blood was coming out and she run and left me on stirrups for a while. She promises to me she just want to check my pregnancy and see if the pregnancy good or no good but she didn't have my consent to take my baby out because I feel my vagina was pulled out and one drop of blood was coming out and she run upstairs without any explanation and leave me on the stirrup. After while she was coming back, and She said the reason she left the room she has to rush upstairs because someone need to deliver the baby. She told me my pregnancy not good, and I was miscarriages. I believe I was miscarriages because of her finger go inside my vagina and pull my vagina out and cause my miscarriages.

The first 2 doctors from NY Presbyterian didn't say I was miscarriages or anything when I was arrived on the evening of June 30th, 2021 approximately admitted to hospital approximately between 08:00-11:00 pm at waiting room registration but the first 2 doctors on June 30, 2021 said the baby no heartbeat and not growing but the Doctor No.4 said I was miscarriages after she examine me On July 1st, 2021 approximately between 0630-0800 am after she put her finger on vagina and pull my vagina out and one drop of blood coming out.

I don't remember was the discussion with The doctor no. 4 but she did give the option whether I want to have surgery to take the baby out or take medication to get the baby out and it will painful (stomach pain) or I am not recall if she give the third option. I believe the condition she gave me by pulling my vagina out and bleed is the third option but I told her I will wait for this baby and hope there's will be heartbeats in the future and she said let's check if the baby good or not but she didn't say she will take the baby out and she told me she will check only. She doesn't have permission to take my vagina pull out without my consent even though this baby not growing or no heartbeat because miscarriages and no heartbeat diagnose were 2 different conditions. I hope my baby will have heartbeat in the future through prayers. Finally, I was discharged On July 1, 2021 approximately at 11:00 am and I was diagnose on my discharge paper as Miscarriages. She told me that I was miscarriages, and I don't need to take the medication and the baby will go down by itself and I will have heavy bleeding.

In or around July 26, 2021, I started within my role as a Hospital Police Officer at Metropolitan NYC Health + Hospitals. My employer has been notified of my sincerely held religious belief and need for accommodation for prayer. While I was assigned to the midnight shift, I request to be move to the morning shift because Sgt Rodriguez told me back in October 2021 said he doesn't have enough people working on midnight shift to relieve me to pray. Sgt Rodriguez told me to request Captain Melendez to work in morning shift as it would allow me to pray without requiring accommodation due to the time of my shift and scheduled breaks. I was told by Captain Melendez that I could not move to the morning shift because they already had enough female staff on the morning shift, but I found out he place new younger female officer 22 years old P.O Sultana to work in the morning shift. Instead of being allowed to adjust my shift, I was told that I would be provided relief so that I could be accommodated.

On September 24, 2021, I submitted the covid vaccine card to Captain Melendez which contain my age and my birthday. I started receiving negative comments of my working performance from my supervisors, Unfair working assignment and condition, verbal harassment by supervisor during roll call briefing. I started to receive negative evaluation about my job performance verbally and in writing. My negative working performance was signed by Captain Melendez (chief Hospital Police) and Angela Mullett (Assistant Director of Human resources). Many time Detective King (Trainer) was complaining about my negative working performance "why you did this and why you did that" and she told me "it will be on your file".

Many time Capton Laboy told me during roll call "McDonald is hiring" I was told verbally by Sgt Rosado and Captain Laboy that I was fail twice on my working performance evaluation. I had been receiving the negative evaluation which indicated on the evaluation paper that my work performance was unsatisfactory. Sgt Rosado and Captain Laboy said I had one more chance or they will get rid of me. I believed "They" represents human resources or CEO of operations of NYC Health + Hospitals.

I believed I am being watch by the Management because of my protected activity. Also, during Roll call many time Sgt Rodriguez mentioned that "we need strongest person possible" maybe because of my protected activity and age.

Approximately in the end of January and in the beginning of February, 2022 I was notified during roll call that they eliminate post 2B from midnight shift. I was told By Sgt Rodriguez that I would no longer be working at my assigned post(2B), but I was instead assigned to another position(Post 4), in which it was more difficult to be accommodation but I found out they still have post 2B but it was assigned to another officer.

I never have the same opportunity as other officers who have rotating working assignment, I never given opportunity to work for patrolling post(Post 8, Post 9, Post 10). Instead I always permanently assigned to post 4 since post 2B(No need relief/Freedom post)was taken away from my regular assignment. Many officers refuse to work on Post 4 because this post require relieve. This is the only post need relieved on midnight shift instead of ER officer but ER officer have less-strict than Post 4 because ER unit always have field supervisor on duty so the officer can go to the bathroom.

Many time I was refused to use the accommodation for bathroom. Many time I have to hold my bathroom for a long period of time because going to the bathroom like violation to me. Since I worked on Post 4 I try not eat or drink until morning try to avoid bathroom. I was told not to eat or drink because Detective King said I can't go to the bathroom after my lunch break. She told me I have to called Supervisor on duty for bathroom. Patrolling officers always have more flexible accommodation because the patrolling post not required for relief.

On January 11, 2022 Hospital Police treated me differently when I was refused to see the camera surveillance when my police jacket was missing. Sgt Rodriguez allowed P.O Robinson to see the surveillance camera but refuse me to see the camera. P.O Robinson and I are the same, we both officers but they treated me differently because of my protected activity(Age, Retaliation, Religion, etc)

I was getting write-ups when I lost my jacket while I am on my duty. I told Sgt Desantes that I lost my jacket on Post 2B chair while I and another fellow officers have to restrained one patient to Triage Trauma room who refused the medication.

I called Central operation to check the camera because I believed my jacket missing not long ago. Sgt Desantes told me to go back to locker room and check if I leave my jacket there because he said he will make a report 10-57 of missing police property and I have to make sure I lost it. He didn't initiate to check the camera right away instead he wanted me to wasted time so the thief can have enough time to walkaway with my jacket. I went upstairs to check the mosque because I was praying during my lunch hour there and go back to locker room to see my jacket was there but my jacket nowhere to be found.

I believed Hospital Police have knowledge of this incident because I am really sure the central operation have surveillance and have knowledge of someone stole my jacket but they let the person stole my jacket wanted to write me up for this unfair incident. The most important element of discrimination when Sgt Rodriguez and supervisors told me I can't see the surveillance camera but they let P.O Robinson to see the camera. He treated differently because my protected activity.

Sgt Desantes insisted me to go to locker room instead to check camera right away. I am really sure I had my jacket with me and I don't need to go to locker room to check it but I believed if central really want to find the guy who stole my jacket we were able to catch him because this guy homeless he might be still standing on the bus stop or not far from hospital but they were not willing to find my jacket but I believed their intention is to write me up for someone stole my police jacket while on duty.

I believed if the jacket belongs to Officers Carreras or other officer they might try to find them. I bought this jacket new and I spend almost \$ 150.

In or around February 25, 2022 I sent email to Captain Melendez(Chief Hospital Police) regarding I had been relieve late to pray and request I need accommodation for early morning prayer. In or around March 27, 2022, I requested relief and was met with rude and discriminatory comments by Detective

King (Central Operation Officer). I made a claim of discrimination to the director within our department and the subject of my complaint was placed on leave. While she was on leave the conduct discontinued, but when she returned the behavior continued and escalated. When Detective King coming back from her leave the situation getting worse and All people in my department was against me. Prior I made a claim of Discrimination against Detective King. I only have problem with Detective King. One time While Detective King still on leave nobody reply to my radio communication when I requested the wheelchair from my radio. I called Central and P.O Jones confronted me about my discrimination complaint against Detective King and She told me that I was deserved to be Harass and discriminated against but she still relieved me to pray on time. On April 4, 2022 Central Operation Officer (P.O Agosto) said he doesn't have anybody to relieve me to pray. I was off on April 5 and April 6, 2022. On April 7, 2022, P.O Wood refused to give me accommodation when I requested to be relief in order to pray. P.O Wood told me on the phone that Sgt Rodriguez told him to relieve me late to pray and he transfer the call to Sgt Rosado. Sgt Rosado also told me that I will get relief from my post at 05:13 am in order to pray. I told him that time will be late for me to pray. I notified him I will walk out the post if nobody relieves me on time. Finally Detective King came to relieve me after I told them I will walk out the post. I had called out on (Thursday night to Friday Morning) April 8, 2022 because of pressure I had from my supervisors in my department and on the same time I sent email to the CEO Hospital Administration (Michelle Figueroa, John Muniz, Captain Melendez) on April 7 at 12:57 pm that I need accommodation to leave my post if nobody relieve me to pray. In this position, I had ongoing difficulties being provided relief and I notified my supervisors that if I was not provided relief in a timely and respectful manner, I may be forced to leave my post in order to do pray. On April 8, 2022 approximately at 11:45pm and April 9, 2022 approximately at 01:45 am Sgt Rodriguez and Captain Laboy asked me to log in to my employee NYC Health + Hospitals account. He told me he will do some assessment for me, but it's seemed suspicious to me because they were not supposed request to access my employee account. They asked me to go back to my post and they have access of my employee account. I believed the Hospital Administration have a plan to fire me on April 09, 2022 because I sent email to CEO of hospital administration and told them I will walked out the post that day if nobody to relieve me to pray. I believed Sgt Rodriguez and Captain Laboy try to erase my negative performance evaluation from my account because I found out my negative evaluation of my poor performance was erasing from my account but I do have the copy of my negative evaluation and write ups prior the deletions which Captain Laboy gave me before to sign. In or around April 9, 2022, I requested relief but was not provided with any support and so I left my post to pray. Immediately I was called and forced to report to the office of the director who noted that I Had committed misconduct by leaving my post. I was told that I would need to choose between the job and prayer. I told them I would choose prayed and turned in my badge and other employment materials. While they asked me to stay within my position, I notified the respondent that if I would not be allowed my accommodation and not be accommodated, I would have to constructively discharge. I believe I have been discriminated against based on my religion, Muslim, my sex, female, and my age, 47, in violation of Age Discrimination Act of 1975, as amended, and in violation of Title VII of the Civil Rights Act of 1964, as amended

I declare under Penalty of Perjury that
the above is true and correct

07-28-22

DATE


ERICA FEBRIANTI

CITY OF NEW YORK

~~NYC~~

Amended Complaint.

NYC HEALTH + HOSPITAL Remained the same

(30)

I strongly believed my protected activity at NYC health+Hospital made me denied to filled the police report twice. the first one was NYPD eviction complaint on September 19, 2024 and the second complaint I was refuse to filled the hate Islamophobic complaint(August 24, 2024).

(31)

I got 26(F) phone conference with Mr. Rodalton Pole On September 19, 2024 at 11:00 am to discussed the Schedule Order and Management Plan and on the same night I send email to Department Human Rights to add August 24, 2024 additional complaint of sexual harassment complaint to Department Human rights against Department Homeless Shelter and the same night I did not allowed back to the shelter and I called 911 operator to report about my eviction from the shelter and the 911 operator said "there is nothing we can do". I called the NYPD second time but no body came I was force to stay on the street against my free will because of protected activity.

(32)

NYPD refuse me to filled the complaint because my race, religion and my protected activity of having lawsuits against NYCHHealth+Hospitals, refuse to hired Hospital Care Investigator (List 586) because filled internal religious complaints at NYCHHealth+Hospitals, Refuse to hired as HCI(list 586) because of my defective lawsuit 2016 at Southern District Court against Starwood worldwide when NYC Health +Hospitals use the same tactics of discharged as Starwood worldwide when I was constructive discharged first and terminated letter send in the email and the Investigation during periods of constructive discharged and termination letter sent in the mail to cover constructive discharged.

(33)

I had 2 occasional incident refusal to filled police report which I believed because my protected activity NYPD officers has refused me to filled the complaint. The first complaint was on August 24, 2024 when I received islamophobic slur incident from black lady in my shelter when NYPD came to my shelter and refused me to filled the complaint because of my protected activity and they said "why you called us instead calling them". NYPD has put Islamophobic complaint slightly by refused me to filled the complaint. The second complaint was in September 19, 2024 on the day I was evicted for the shelter and I called 911 to report eviction and the 911 operator said there's nothing we can do.

Complaint Submit to CCRI3

(1)

- (34) I believed 2 NYPD officers who came to my shelter and refuse me to filled the Islamophobic slur is discrimination against my race(Indonesian) and religion(Islam) and because the Islamophobic harasser is Black American, non muslim. NYPD had taken my Islamophobic complaint slightly..
- (35) NYPD is public accommodation and everyone should be welcome and have equal rights to receive and allowed to filled the complaint and filed charges the regardless their race, religion and protected activity.
- (36) I believed NYPD has refuse me to filled the Islamophobic slur incident because my race Indonesian and my dress represent my religion Islam because I am hijabi Muslim lady who represent my religion, and my race: Indonesian.
- (37) NYPD officers who refused me to report and filed the Islamophobic slur complaint was scolding me and saying:

"why you called us (911) except to complaint to them"

- (38) My Question : "why not" it hurts me when the NYPD said that with both officers have body cam on that I can't filled the complaint why my rights differ than black, Spanish, white, other race ladies in my shelter. They allowed to filled the charges and complaint under their free will. I was treated differently by this 2 NYPD officers because of my race and religion and my protected activity.
- (39) Islamophobia is very serious matter and never put slightly she made fun of me and my religion but I was refuse by NYPD to filled the Islamophobia complaint because of my race, religion and my protected activity.
- (40) Mistreatment when Black people or outside my race called the police the police officers come directly upstairs to their room but for me I have to go downstairs because of my race and religion I am less important in officers eyes.

- (41) On August 24, 2024 approximately between 6:00- 6:45 am. I was called 911 from my phone number: 929-615-1758 to report the hate Islamophobiacomplaint in my shelter, 78 Catherine St, New York, NY 10038.

- (42) I stay at the room 442 and when I leave my room intention going to the bathroom, I saw one lady was standing up by the window in front of window of room 443 in the hallway, she did not say nothing when I was passing by until another Shelter operation employee(Dondre Bailey) keep approaching me. came from opposite direction and when I was passing by him(Dondre Bailey) we (Me and Dondre Bailey) both say Hi and when I was approximately almost reach between the room 447 or room 448 and the Dondre Bailey and the black lady were very much on the same position. who stood by the window in front of the room 443, the black lady by the window shouted the Islamophobic slur at me and saying:

Hi Miss why you here, is your husband beat you up? You are Muslim, you walk like you're special, you ain't special, you Bitch

- (43) The shelter Operation (Dondre Bailey) did not saying nothing to tell the lady to stop and until I called 911 to report the hate complaint and the police came and Shelter Operation (Dondre Bailey) notified me while I was in the bathroom and asked me if I called the police about the lady and he(Dondre Bailey) said the police officers was arrived and I have to go downstairs because the police officers did not going

Complaint

Submitted to court

②

upstairs because this is not fight or less important case. Not sure if the shelter operation refuse police officers to go upstairs to go to my room or the police did not wanted to go upstairs under their freewill because I am not important because my race and my religion and by the time I went downstairs both police officers have body cam on and blaming and scolding me why I called them (911) Instead filling complaint to the shelter operation but I believed everyone should have rights to filled the NYPD complaint too regardless their race, religion and protected activity.

(44) I told on the police body cam that the shelter operation (Dondre Bailey) was there too and he did not escalated the black lady to stop the Islamophobic slur against me and I believed he (Dondre Bailey) was initiated to her to say that because the black lady said that word exactly when the shelter operation (Dondre Bailey) reached her position by the window in front of room 443. I believed she did that because of her black privileges on her when she saw Dondre Bailey (Shelter Operation Employee) coming towards her because Dondre Bailey is Black and the black lady have protected of the Islamophobic slur against me because she is black.

(45) Both police officers was scolding me and argue with me on their body cam was on and both police officers said:

"why you called us (911) except to complaint to them"

(46) Them meaning the shelter operation I told the police on their body cam that the shelter operation (Dondre Bailey) was there too but I did not hear he was saying escalated the situation or say something to the Islamophobic lady and the both the black lady and Dondre Bailey (Shelter Operation Employee) almost stand on the same position when the black lady mentioned the Islamophobic Slur against me.

(47) The police officers said I should made complaint to the shelter operation and both officers left with refusal to take my Islamophobic complaint which I believed it's discrimination because of my race and religion and Dondre Bailey said earlier when I was in the bathroom the both police officers was spoke to the black lady downstairs and refused me to filled the Islamophobia complaint because she is black and non Muslim.

(48) My Islamophobic slur hostility environment complaint was denied by (NYPD) I believed because mistreatment because of my race: Indonesian, religion: Islam, My protected activity.

NYPD Race Profiling, retaliation of filling CCRB complaint, Discrimination Based on my race, Religion and my protected activity

49

I had 2 occasional incident refusal to filled police report which I believed of retaliation because my protected activity of having lawsuit against the city (NYC Health+Hospitals and DHS) and leading to Racial Profiling Discrimination when NYPD officers has refused my rights to filled the hate Islamophobic complaint(August 24,2024) and The Eviction Complaint on September 19, 2024 .

50

The first complaint was on August 24, 2024 when I want to filled the hate Islamophobic slur Complaint incident from black lady in my shelter when NYPD came to my shelter and refused me to filled the complaint because of my protected activity and they said "why you called us instead calling them ". NYPD has put Islamophobic complaint slightly by refused me to filled the complaint. The second complaint was in September 19, 2024 on the day I was evicted for the shelter and I called 911 to report eviction and the 911 operator said there's nothing we can do.

51

NYPD DISCRIMINATION REFUSE ME TO FILLED THE POLICE REPORT TWICE ON AUGUST 24, 2024(HATE ISLAMOPHOBIC COMPLAINT) AND SEPTEMBER 19, 2024 (EVICTION COMPLAINT) "BUT FOR" of Racial Profiling "But For" the way I was dress represent my religion as Muslim HIJAB woman and NYPD has take my Islamophobic complaint slightly because of My race as Naturalize Citizen Indonesian American V the Islamophobic Lady is Black American , NYPD OFFICERS judge me FROM THE WAY I WAS DRESS as hijabi muslim woman and refuse the service (to filled HATE ISLAMOPHOBIC police reports complaint) because the color of my skin and my religious belief as Muslim woman and Islam as My religion and My protected activity of having lawsuit against the city(NYC Health+Hospital and DHS) AND I FILLED THE CCRB COMPLAINT ON SEPTEMBER 2024 WHEN I REPORT THE NYPD OFFICERS MISCONDUCT who refused me to filled the complaint to CCRB AND CCRB conducted INVESTIGATION ON SEPTEMBER 13, 2024 ALSO REFUSE ME TO FILLED THE DISCRIMINATION COMPLAINT ON OFFICERS WHO REFUSE to filled a police report on MY HATE ISLAMOPHOBIC COMPLAINT WHEN THE HATE ISLAMOPHOBIC COMPLAINT WAS HANDLE SLIGHTLY by the officers AND UNDERESTIMATED THE HATE OF ISLAMOPHOBIC COMPLAINT was not a big thing or less important and repeated again when I was denied to filled the eviction complaint on September 19, 2024 when I was evicted from my own bed and denied entry to my bed and denied rights to shelter when I was evicted from my own bed which denied entry to my own bed and not consider "public place" as qualified as "dwelling" under "king castle" doctrine which NYPD should allowed me to filled NYPD eviction report.

52

NYPD Officers refuse me to filled the Islamophobic complaint; denied my rights to filled hate Islamophobic complaint and said: On August 24, 2024:

"why you called us except calling them"

53

NYPD refused me to filled the eviction complaint again repeated again on September 19, 2024 when I called 911 to report my eviction and I am not sure the 911 operators asked

my name after and refuse the eviction called when I mentioned my name and my address and she said "there is nothing we can do" and I called again one more time the ring tone was ringing twice and I believed my number was forward to another Supervisors on duty and the guy was picking up the phone and nobody came no phone call and I was force stay on the street. I believed my rights had been violated because of my protected activity of having lawsuit against the city(NYC Health+Hospital and Department of Homeless services.) which leading to discrimination base on my race, Indonesian American and My religious, Islam and My protected Activity of filling discrimination against the city(Nyc Health+Hospitals and Department of Homeless services).

(54) CCRB Investigation: On September 13, 2024 : also refuse my Islamophobic complaint by refusing discussing the subject matter of Race and Religion Discrimination by refused to discuss the officers misconducts on August 24, 2024 and Both Officers take my Islamophobic slightly.

(55) I want to filled the complaint against the hate Islamophobic lady but the officers refused me to filled Islamophobic complaint. The officers should not discriminated who should allowed to filled the complaint because I filled my taxes too like others but the officers look down on me because of my race and religion. Both officers racist because of my race and my religion and retaliation

(56) I WANT TO AMMEND THE COMPLAINT WITH CONDITIONS as my original complaint with NYC health+ Hospitals are remained the same ONLY TO ADD NYPD AS DEFENDANT DISCRIMINATED AGAINST MY RACE, INDONESIAN AMERICAN V ISLAMOPHOBIC HARRASER LADY IS BLACK AMERICAN, NYPD officers who refuse my complaint has motive on racial profiling by refuse me to filled Islamophobic complaint.

(57) RELIGION: ISLAM

(58) MY PROTECTED ACTIVITY: HAVING LAWSUIT AGAINST THE CITY(NYC HEALTH+HOSPITAL AND DHS (DEPARTMENT OF HOMELESS SERVICES)

(59) MY PROTECTED ACTIVITY : RETALIATION OF REPORT OF MISCONDUCT OFFICERS to CCRB for NYPD officers WHO REFUSE ME TO FILLED ISLAMOPHOBIC COMPLAINT AND "but for" CCRB COMPLAINT and my protected activity made the NYPD REFUSE ME again TO FILLED THE EVICTION COMPLAINT ON SEPTEMBER 19, 2024 AS ACT RETALIATION WHEN I REPORTED "BUT FOR" FILLING CCRB COMPLAINT on September 2024 (REPORTED THE NYPD OFFICERS MISCONDUCT OF REFUSE ME TO FILLED MY ISLAMOPHOBIC COMPLAINT ON AUGUST 24, 2024 INCIDENT DUE discrimination based on my RACE, RELIGION AND PROTECTED ACTIVITY OF HAVING LAWSUIT AGAINST THE CITY, (NYC HEALTH+HOSPITAL AND DHS) ON SEPTEMBER 2024 AND CCRB INVESTIGATION REFUSE MY RACE, RELIGION DISCRIMINATION COMPLAINT ON SEPTEMBER 13, 2024 HAS CAUSE ME REFUSED TO FILLED THE EVICTION COMPLAINT ON SEPTEMBER 19, 2024 AND HAS CAUSE ME LOSE RIGHTS TO SHELTER AND I HAVE TO STAY ON THE STREET .

(60) NYPD officers who refuse me Islamophobic complaint and to filled eviction police report was "but for" racial profiling because of my race: Indonesian American V Islamophobic

harraser lady, Black American , Religion: Islam from the way I was dress represent my religion Islam and my protected activity of having lawsuit against the city(NYC Health+hospital and DHS).

(61) According Dondre Bailey(Shelter Employee) the both police officers spoke to the Islamophobic harasser lady and the officers let her go. Dondre bailey also said the police officers not going upstairs on August 24, 2024 and when I went downstairs officers was scolding me "why you called us except calling them" by refuse to filled Islamophobic complaint because the officers look down on my religion and take my Islamophobic complaint slightly and consider of racial profiling because I am as Naturalize citizen as Indonesian American and the black Islamophobic lady as Black American. I believe I was refuse to filled the complaint because of race profiling and the officers look down on me as Muslim and my skin color because the way I was dress represent my religion as Muslim hijabi woman and from the way I looks I was represent foreigner to the officers.

(62) "but for"(SEE EXHIBIT CCRB INVESTIGATION.) I report the NYPD officers misconduct to CCRB on September 2024 regarding the incident on August 24, 2024 (refused to filled Islamophobic complaint and CCRB conducting the investigation on September 13, 2024 and has cause me refused to filed eviction police report again on September 19, 2024 "but for" my protected activity of filling CCRB complaint in September 2024 and protected activity of having lawsuit against the city(NYC Health+hospital and DHS) has caused me denied rights to shelter when I was evicted from my own bed which not consider "public place" as qualified as "dwelling" under "king castle" doctrine which NYPD should allowed me to filled NYPD eviction report.

(63) I WILL ADD NYPD(New York Police Department) NOT DHS (Department of Homeless Services) TO THE COMPLAINT AND WITH CONDITIONS ALL NYC HEALTH+ HOSPITAL ORIGINAL COMPLAINT WAS REMAIN THE SAME NOTHING CHANGES.

(64) I WANT TO AMMEND THE COMPLAINT WITH THE CONDITIONS THAT MY ORIGINAL COMPLAINT WITH NYC Health+Hospitals was remained the same and THE RESPONDENT, NYC HEALTH+ HOSPITALS, CANNOT CHANGE THE POSITION STATEMENT EEOC STATEMENT WHICH ALMOST ALL THE EEOC POSITION STATEMENT WAS SIMILAR WITH DEFECTIVE CASE JUDGE FURMAN STATEMENT IN STARWOOD WORLDWIDE WITHOUT ANY PROVED.

(65) I WANT TO AMMEND THE COMPLAINT WITH CONDITIONS THAT, NYC HEALTH+HOSPITALS THE DEFENSE COUNSEL, CANNOT CHANGE HIS STATEMENT ON OCTOBER 2, 2024 SAID VERBALLY TO THE COURT THAT MY TERMINATION ON APRIL 12, 2024 WAS RELATED TO MY NEGATIVE WORKING PERFORMANCE "BUT FOR" ACCORDING TO CITY OF NEW YORK I WAS QUALIFIED FOR THE JOB (SEE EXHIBIT TACTICAL BATON CERTIFICATION)

2027
(66) "BUT FOR" THE DISCREPANCIES OF MY NEGATIVE WORKING PERFORMANCE" DUE TO "PROXIMITIVE CAUSE" OF ACCORDING TO LADY'S STATEMENT THE HOSPITAL POLICE DEPARTMENT WAS FACING AGING ADVERSE HOSPITAL POLICE DEPARTMENT ACTION (SEE EXHIBIT EEOC(0), PAGE 5-6, LIST NO. 12) INDICATED THE SAME TIME FRAME of Officer Day, E was retired(See Exhibit T, Police Memo Books) OF MY TRAINING AT NYC HEALTH+HOSPITALS WAS DIFFER THAN THE YOUNGER NEW OFFICERS AND I WAS LEFT BEHIND BY THE YOUNGER NEW OFFICERS because I am

older new officers which on the same time frame I was refused the bathroom accommodation which leading to ADA Discrimination(See Exhibit the doctor said I got prediabetes) in December 2021-April 9, 2022 which "but for" my prayer accommodation was struggling to be accommodated made me reluctant to request bathroom accommodation under ADA(Prediabetic) because my prayer is my everything if my prayer did not accommodated I cannot work there (See Exhibit Doctor said I got prediabetes), Health Condition(See Exhibit Urinary Tract Infection) "the but for" correlations of holding the bathroom and premeditated of Undue Hardship after filling Internal religious complaint(See Exhibit A, B, C, F and Exhibit N-2) which leading to my constructive Discharge ON RELIGION DISCRIMINATION (See Exhibit L-3) AND refused to hired as per filling internal religious complaint to the highest position at NYC Health+hospital hospital administration WHICH I BELIEVED BECAUSE I ASKED QUESTION TO CEO OPERATION of NYC Health+Hospitals , MICHELE FIGUEROA and the Director of Operation of NYC Health+Hospitals, John Muniz which both of these person was the top high of NYC Health+Hospitals administration which very easy for them to inform to the recruiter of Hospital Care Investigator List : 604 not to hired me because of filling the internal complaint religion discrimination by not sending the "onboarding package" of HCI, List :604 and on my email (See Exhibit L-3) when I was asking question to CEO operation "If my prayer time conflict with Hospital police operation" she said my case will refereed to EEO officer and when EEO officer and my voice limited when the

67 THE LADY STATEMENT in the same time frame of I was left behind when my training was differ with the younger new officer REGARDING OLDER OFFICER WHO CAUSE "ADVERSE THE HOSPITAL POLICE ACTION" BECAUSE OF HER AGING , THE SAME TIME FRAME ON HER(Officer Day, E TRANSITION TO RETIRED AND THE DEPARTMENT 'PAUSE MY TRAINING AND STARTED ASSIGNED ME AT POST 4 MAIN LOBBY WITH DIFFICULTY OF PRAYER & BATHROOM ACCOMODATION MENTIONED:

THERE'S ANOTHER LADY WHO USED TO WORK AT POST 4 MAIN LOBBY SHE WAS OLD AND SHE CALLED SICK ALOTS AND THE DEPARTMENT CAN'T WAIT FOR HER TO RETIRED

68 See Exhibit CCRB INVESTIGATION) NYPD is public servant and I am the tax payer regardless of my race, religion and protected activity of reporting the NYPD officers misconduct Investigation On September 13, 2024 I supposed to have equal rights to able to filled the police reports.

69 NYC Health+hospitals, Department of Homeless Services and NYPD (CCRB) defense counsel located at the same location at 100 church street, New York, NY 10038 and definitely all the incident which happened was considered under protected activity.

70 NYPD should apply to everyone regardless their religion, race and protected activity and it's 2 times NYPD refuse me my rights as tax payer to filled police report and I supposed treated equally in the eyes of Law and received equal rights in society.

71 I was refuse to filled Islamophobic police report on August 24, 2024 because of protected activity which leading to race profiling discrimination based on my race and my religion and the second time I was refuse to filled the eviction of NYPD police report

on September 19, 2024 "but for" I was filled the discrimination CCRB complaint on September 2024 which CCRB located the same location as per defense counsel Rodalton Poole at 100 Church Street, New York, NY 10038(See Exhibit CCRB investigation) conducted on September 13, 2024.

- (72) I pay my taxes last year for \$350 in the year 2023 for this reason NYPD is public servant because their salary at least from accumulated tax payments to the city and I am the one of tax payers.
- (73) "But For" the CCRB investigation on September 13, 2024 I filled the CCRB complaint On September 2024 and now I was refused the benefit of NYPD protection from being evicted from the shelter
- (74) (See Exhibit SGT Paulson Statement) But for" I filled CCRB complaint on NYPD conducted investigation on September 13, 2024 has cause me NYPD refuse me to filled eviction complaint again On September 19, 2024 and now I stay on the street and the most important point regardless what happened in Department of Homeless Services, NYPD should not retaliate on September 13, 2024 CCRB investigation because of my protected activity of having lawsuit at NYC health+hospitals and Department of Homeless Services by let me stay on the street because NYPD should protecting me under the law of king castle doctrine I should be protected from being evicted from my own bed which is not be accessible to public space and my own bed located in the room with the secure door not on the street and I have locked in my locker which considered private dwelling not accessible to public or and kings castle law should apply to my bed because according budget letter HRA the shelter received approximately \$ 800 or \$600 per month for me to live there. I had my living life creature fish on top my locker probably dead by now .
- (75) NYPD DISCRIMINATION(REFUSE TO FILLED THE POLICE REPORTS OF HATE ISLAMOPHOBIC COMPLAINT) BASED ON MY RACE, INDONESIAN AMERICAN VERSES ISLAMOPHOBIC HARRASER LADY BELONG TO BLACK AMERICAN RACE , RELIGION: MUSLIM, RETALIAITON : MY PROTECTED ACTIVITY OF FILLED THE DISCRIMINATION COMPLAINT AGAINST (NYC HEALTH+HOSPITALS AND DHS) AND RETALIATION OF FILLING OF CCRB COMPLAINT ON SEPTEMBER 2024 AND HAS CAUSE ME I WAS REFUSE TO FILLED THE EVICTION COMPLAINT ON SEPTEMBER 19, 2024 AND CAUSED ME DENIED RIGHTS TO SHELTER AND HAS CAUSE ME SEVERE LIFE EXPERIENCE OF LIVING ON THE STREET
- (76) "BUT FOR" REPORTED THE DISCRIMINATION COMPLAINT BASED ON MY RACE AND RELIGION TO CCRB; NYPD ON SEPTEMBER 2024 WHICH THE DISCRIMINATION HAS OCCURRED WHEN NYPD OFFICERS MISCONDUCT OF REFUSED ME TO FILLED ISLAMOPHOBIC COMPLAINT ON AUGUST 24, 2024.
- (77) "BUT FOR" I FILLED THE DISCRIMINATION COMPLAINT BASED ON MY RACE AND RELIGION, CCRB NYPD HAS CONDUCTED INVESTIGATION ON SEPTEMBER 13, 2024 (SEE EXHIBIT CCRB INVESTIGATION) WHICH THE INVESTIGATOR, SGT PAULSON DID NOT ADDRESS THE ISLAMOPHOBIC COMPLAINT SERIOUSLY INSTEAD THE CCRB INVESTIGATOR, SGT PAULSON DISCUSSED ABOUT SOMETHING ELSE AND SGT PAULSON AVOID THE SUBJECT MATTER DISCUSSION AND I ASKED HIM IF HE READ MY COMPLAINT AND HE SAID "YES" THE CCRB INVESTIGATOR TRYING AND FORCE ME VERBALLY TO SWITCH AND TRY TO CHANGE MY WRITTEN RACE, RELIGION NYPD DISCRIMINATION COMPLAINT TO SOMETHING ELSE

(78)

WHEN I AM ASKING HIM IF HE TOOK MY ISLAMOPHOBIC COMPLAINT SLIGHTLY AND SGT PAULSON SAID I TRY TO PUT WORD ON HIS MOUTH AND THE CONVERSATION GETTING INTENSE UNTIL I CAN HEAR SGT PAULSON ANNOYING BREATH WHEN HE SAID "O MY GOD...AFTER I WAS DISCUSSED ABOUT THE ISLAMOPHOBIC HARRASER LADY PROBABLY THE SAME PERSON WHO ATTACKING ME BY FRANKLYN AVE AND FULTON ST AND ASKED ME IF I FILLED THE POLICE REPORT ON THAT AND I SAID "NO" AND HE SAID I MUST GO TO PRECINT 1 BUT THIS CASE WAS RELATED TO THE SUBJECT MATTER OF THE PROBABLE THE SAME PERSON ATTEMPTED TO ATTACKING ON ISLAMOPHOBIC HARRASER AT THE SHELTER WHICH I BELIEVED WAS THE SAME PERSON WHO SHOUTED ME THE ISLAMOPHOBIC SLUR IN THE SHELTER AND THE ISLAMOPHOBIC ATTACK IN BROOKLYN BY THREW ME PHONE ON MY FACE IN BROOKLYN BETWEEN FRANKLYN AVE AND FULTON STREET BUT THE PHONE FELT ON THE FLOOR PRIOR REACH MY FACE BUT SHE WAS ATTEMPTED TO HURT ME BUT CCRB, SGT PAULSON SAID MY CASE WAS CLOSED WITH HIS ANNOYING BREATH MADE ME FELT UNCOMFORTABLE HE PROBABLY RACIST TOO.

Franklin Ave

(79)

I ALSO DISCLOSED AT CCRB ABOUT THE SEXUAL HARRASMENT AGAINST DHS EMPLOYEE, WILLIAMS WILLKINS WHO MADE OFFENSIVE COMMENTS ON MY PERSONAL BODY " I WAS DISCUSSED ABOUT I WAS NEITHER ABLE TO FILLED THE ISLAMOPHOBIC COMPLAINT NEITHER NYPD OR DEPARTMENT OF HOMELESS SERVICES (DHS) AND WHEN I DISCLOSED THE CCRB INVESTIGATOR ABOUT "SEXUAL HARRASMENT" OFFENSIVE COMMENTS FROM THE SHELTER MANAGER, WILLIAM WILLKINS MADE OFFENSIVE COMMENT OF MY PERSONAL BODIES IN ORDER FOR ME TO NOT TO FILLED THE ISLAMOPHOBIC COMPLAINT AGAINST THE BLACK LADY BECAUSE THE SHELTER MANAGER, WILLIAM WILLKINS IS BELONG TO BLACK RACE.

(80)

"BUT FOR" CCRB, IAFB NYPD REFUSED MY RACE, RELIGION DISCRIMINATION COMPLAINT ON SEPTEMBER 13, 2024 HAS CAUSED ME REFUSE TO FILLED THE EVICTION COMPLAINT FROM THE SHELTER ON SEPTEMBER 19, 2024 AND CAUSE ME LIVING IN SEVERE CONDITION ON THE STREET.

(81)

Department of Homeless services RACE, RELIGION AND SEXUAL HARRASMENT DISCRIMINATION COMPLAINT currently still under investigation by division of Human rights and HUD (Housing Urban Development) unit. THE DHS submit the position statement on May 6, 2024 and May 20, 2024 I submitted the rebuttal statement of DHS position statement.

(82)

The hardest living condition and the court should not dismissed my NYPD refused me to filled the eviction complaint on September 19, 2024 as act retaliation of filling CCRB complaint on September 2024 and CCRB investigation on September 13, 2024(See Exhibit CCRB investigation)

(83)

Being homeless as woman extremely hard and not easy especially during period and 5 days ago there was power outages on the A train at Jay Street in Brooklyn and the police asked people to go outside the station and for me is not easy because my living and my roof depend on the train and the train is my shelter and without train I don't know where to go and also I was carrying my cart and it was raining outside, I got the headache and hungry too and people rush to go home but for me I got no home and the train is my home. Wallahi, Allah is my witness it's very difficult which especially people who ride the train at night is not regular people and one time one guy came with needle and knife and me and the lady run from these people but these people so weak so I can push him but druggies people sometime they do not think clearly and not sure they might do to me and they probably can do whatever they want sometime. One time I sat by port authority bus terminal but I need to buy new jersey bus ticket

in order to sit there because the seat for bus ticket holder only, and one time I was asked to leave by port authority police because she knew I was sleeping at port authority and not taking the bus and I got no choice. I took the bus anyway to jersey going no where and when I was getting off bus at jersey it was at midnight at 2:00 am and nobody around at New Jersey and I walked long distance passing the wood and jungle and nobody around I alone at midnight in cold weather carry my cart and one time I was fall to sleep on the last stop of the train when I wake up nobody was around and one time there's man who sit by my side and even though there were many empty seat and he choose to sit close to me. One time when I got up there was a man touching my face and he said he wanted to take me to drink coffee and the point I would like to say please do not dismissed my NYPD complaint because I might be someone else daughter's wife's grandmother and the last sermon of prophet Muhammad peace be upon him said; Be good to your woman which in Islam woman is property of Allah which according to the hadith prophet Muhammad peace be upon him said anyone who made women cry they will curse every step they walked in.

(84) The Hadith of Prophet Muhammad peace be upon him said:

Whoever amongs you wake up in the morning and safe in his home, in a good health and has enough provision for that day, it is as he has all the good things of this world

Home is the basic of human life which this condition is very difficult for me sometime I try to avoid the bathroom because the cleaning lady at port authority denied my bathroom because she did not let me to use water down there which in Islam I must clean with water on my private part after pee or No. 2 and I told her it's my religion I need to put water on my personal part and she said "religion, religion", "Fuck you" and one time I was denied the bathroom and she asked me to get out and curse me out in front of another ladies in the bathroom and embarrassing me because I carry the cart and she knew I was homeless and she said go to shelter and I just found out her name is Marrie(woman Bathroom cleaner at 2nd Floor lady's bathroom port authority and I was refuse to use the port authority bathroom accommodation because of my religion, Islam and another lady they don't use water but I have to use the water because the hadith prophet Muhammad peace be upon him said Cleanliness is part of Iman (faith) but with my homelessness condition it's so severe so struggle to performed my religious belief in order to do ablution in order to pray or read the Qur'an and if I have urine on me(Clothes) it's a sin and I will get the punishment of the grave. Also the other day I was sick but I got no place to rest and I sleep on the train and cough in front of people so uncomfortable as woman.

The Hadith of Prophet Muhammad peace be upon him said :

(85) Sayyidna Ibn Abbas reported: The Messenger of Allah ﷺ happened to pass by two graves and said: They (their occupants) are being tormented, but they are not tormented for a grievous sin. One of them carried tales and the other did not keep himself safe from being defiled by urine. He then called for a fresh twig and split it into two parts, and planted them on each grave and then said: Perhaps, their punishment way be mitigated as long as these twigs remain fresh.(Sahih Muslim and Sunan Tirmidhee).

- (86) NYPD refusal to take my eviction complaint on September 19, 2024 as act retaliation of my CCRB NYPD investigation on September 13, 2024 (**SEE EXHIBIT CCRB NYPD INVESTIGATION**) and protected activity having lawsuit with NYC health+Hospitals and Department of Homeless Services.
- (87) NYPD definitely retaliate after my CCRB complaint investigation on September 13, 2024 (**See Exhibit CCRB NYPD INVESTIGATION**) when the CCRB investigator, Sgt Paulson asking me to modify my writing complaint NYPD race discrimination complaint by twist my word at verbal investigation and kept talking to escape from the subject matter when I said "did you read my complaint" "did you put my islamophobic complaint slightly" and he said I put the word on his mouth. Sgt Paulson said NYPD have **problem with Department of Homeless Services too** (CCRB Investigator, SGT Paulson discussing my protected activity with DHS on recorded phone line) too but I was discussing about the NYPD officers misconduct on August 24, 2024 who refuse me to filled Islamophobic complaint because my race, religion and protected activity,
- (88) I was denied to filled NYPD eviction of complaint on September 19, 2024 after CCRB NYPD investigation complaint on September 13, 2024(**SEE CCRB NYPD INVESTIGATION**) and my protected activity of having lawsuit at NYC Health+Hospital and DHS.
- (89) NYPD refusal to take my eviction complaint on September 19, 2024 as act retaliation of my protected activity of reported the NYPD officers misconduct to CCRB in which my CCRB investigation conducting **on September 13, 2024** when the CCRB also denied my race, Religion discrimination complaint and cause me refuse to filled NYPD eviction complaint on September 19, 2024 "but for" I have to stay on the street when when I called 911 to report about my eviction from the shelter and the 911 operator said there is nothing we can do and refuse to help me and when I called 911 operator for the second time I believed my number being blocked and the phone ringing twice transferred to another supervisor Sergeant or field supervisor desk and no body came I was force stay on the street.

Thank you so much for this matter.

Sincerely yours,






Erica Febrianti

11/27/24, 3:49 PM

Screenshot_20241127-152341_Messages.jpg

3:23   

< 9292850042

Add to contacts

Block number

Friday, September 13, 2024



Good morning Ms.
Febrianti. My name
is Sergeant Paulson.
I tried contacting you
via email regarding
a recent complaint
you made regarding
some Officers with
the NYPD. I haven't
heard back from
you. I am conducting
a follow-up
investigation into
the allegations you
made. If you would
like to proceed



11/27/24, 3:50 PM

Screenshot_20241127-152451_Messages.jpg

3:24 PM

9292850042

< 9292850042

📞 🔍 ⋮

Hi sgt Paulson. Yes I want to proceed yes. What the best time to called you. I am working now. Do you want me to come to you

10:23 AM

What precint

10:24 AM

I will called you later approximately after 5 pm. Is it okay

10:50 AM

I will call you maybe on my break

10:51 AM

👤 Sure. After 5pm is fine.

3:34 PM

Okay thank you



11/27/24, 3:52 PM

Screenshot_20241127-155100_Messages.jpg

3:51 M M M ...

LTE

< 9292850042

📞 🔍 ⋮

Hi Sgt. Anderson, I just
want to proceed yes.
What the best time to
called you. I am work-
ing now. Do you want
me to come to you

10:23 AM

What precinct

10:24 AM

I will called you later
approximately after 5
pm. Is it okay

10:50 AM

I will call you maybe
on my break

10:51 AM

👤 Sure. After 5pm is
fine.

3:34 PM

Okay thank you

3:38 PM



V. ADMINISTRATIVE PROCEDURES

For most claims under the federal employment discrimination statutes, before filing a lawsuit, you must first file a charge with the U.S. Equal Employment Opportunity Commission (EEOC) and receive a Notice of Right to Sue.

Did you file a charge of discrimination against the defendant(s) with the EEOC or any other government agency?

☒ Yes (Please attach a copy of the charge to this complaint.)

When did you file your charge? 04-13-2022 (SEE EXHIBIT L-5)

☐ No

07-28-2022 (EEOC FILE CHARGE DUE TO COVID)

Have you received a Notice of Right to Sue from the EEOC?

☒ Yes (Please attach a copy of the Notice of Right to Sue.)

What is the date on the Notice?

MAY 30, 2023

When did you receive the Notice?

MAY 30, 2023

☐ No

VI. RELIEF

The relief I want the court to order is (check only those that apply):

- ☐ direct the defendant to hire me
- ☐ direct the defendant to re-employ me
- ☐ direct the defendant to promote me
- ☐ direct the defendant to reasonably accommodate my religion
- ☐ direct the defendant to reasonably accommodate my disability

☒ direct the defendant to (specify) (if you believe you are entitled to money damages, explain that here)

Economic DAMAGES (BACK pay and Future wages)

Emotional distress and Pain Suffering damages

Punitive DAMAGES

Attorney Fees IF I will have lawyer in Future

Attach to the complaint to Southern District Court Employment Discrimination Complaint

VI. Relief

I have been through so much cost by this job. I am currently in financial hardship.

I lost my unborn baby, I didn't accommodate to pray on time to fulfill my religious belief obligation, denied bathroom accommodation, unfair working assignment, accusation of negative of working performance, verbal harassment from supervisors and Detective King, my reputation ruined cause me not easy to get another job. I am currently in \$14000 debt.

Not easy to find another job when dismissed from city jobs and I am currently struggling to support myself. I am currently have credit card debts in order to support myself since last year. If I did not paid by June 28, 2023 will cause accrued interest in the amount of \$13052 and I also have another credit card bill from another credit cards due next August, 03, 2023 for the amount approximately around \$895 will accrued interest as well. I might be homeless soon. I am currently on food stamp. I am currently have \$222.15 on my checking account right now. I am currently living in credit card loan to support myself.

I was fired since last year April 2022 during Ramadan and currently still searching for jobs but I still not able to find. I worked for the city so when I get fired from city job my reputation goes down the drain. Nobody wanted to hired me anymore. I never thought I will be unemployed this long but no employer wanted to hired me anymore and dismissed from city jobs will cause dismissed in another city jobs opportunities.

Only woman could only understand how it feels when lost the baby. I have been admired to be a mother for long time when I have the opportunity to have a baby the respondent did not give a chance to be pregnant under my free will.

For this matter I believed I deserve for:

- Economic Damages(back pay and future wages)
- Emotional distress and pain suffering damages
- Punitive damages
- Attorney fees if I will have lawyer in future

VI. Relief**Additional Request for Damages added to Original complaint**

"But for" I was lose the job at NYC Health Hospitals and now I have my interest charges on my credit card and prior I lost the job at NYC health+hospitals I don't have credit card interest charges and I always paid my credit card in full to increase my credit score. Prior I lost the job my credit score was 822 and now I almost used all my credit card balance my credit down to 620.

Also having interest charges was effecting my religious belief and considered a sin in Islam. **Qur'an verse on interest:**

- **Surah Al-Imran, verse 130:** "O, you who believe, do not consume riba(Interest), doubled and multiplied, but fear Allah"
- **Surah Al-Baqarah, verse 275:** "Allah has permitted trade and forbidden riba(Interest)"
- **Surah Al-Baqarah, verses 278-279:** "O you who have believed, fear Allah and give up what remains [due to you] of interest if you should be believers"
- **Surah Al-Nisa, verse 161:** "And because of their charging riba(Interest) while they were prohibited from it"
- **Surah Al-Rum, verse 30:39:** "And whatever riba(Interest) you give so that it may increase in the wealth of the people, it does not increase with Allah"

NYC Health+Hospitals should liable for my interest charges on my credit cards.

Prior I lost the job at NYCHHC I was free from any interest charges from credit card but now my interest from credit card so tremendously increase because I got no choice to use it to buy food WHEN I WAS ADMITTED TO SHELTER AND the shelter did not provide halal food and I was evicted from the shelter and NOW I AM HOMELESS.

In the half year in May 2022 and in July 2023 I used the credit card loan to pay for my rent and when my food stamp running out because I cannot cook and buying food outside so expensive. In August 2023 I was admitted at Women Shelter in the Bronx and I was evicted from the shelter on September 19, 2024.

I believed the city should liable for my hotel charges after September 19, 2024 as well " but for" NYPD refuse my eviction complaint and now I have to stay on the street because sometimes when I accidentally I was peeing on myself when I am sick and I cough and pee on my clothes and pants on the same time and I have to go to book hotel to take shower using my credit card because in Islam not allowed to pray if I have pee on the clothes or body because it's a sin I will get punishment of the grave according to prophet Muhammad peace be upon him. I have to pray 5 times a day in

clean state(Body and clothing) and without no pee on the body and clothes because in Islam religion the cleanliness is part of Iman or religion. For this reason I am requested damages as described below:

1. Punitive damages (back to back discrimination from left and right, DHS, NYPD, NYC Health+Hospitals), etc
2. Emotional distress and pain and suffering
3. Economic damages (back pay and future wages)
4. Interest charges from Credit Card(Food, hygiene products) excluded from my personal expenses because if I did not lose my job at NYC Health+Hospitals I can afford to buy food without paying interest on my credit card and I will able to pay the balance in full monthly without have to pay interest. If I have a job and I can cook at home if I have home which will be cheaper but now I am homeless I cannot cook and buy food so expensive and food stamp not enough to covered monthly food expenses because buy ready food so expensive. I eat once a day now, only dinner but sometime I eat breakfast with my credit card if I wanted to use the bathroom because I cannot used the bathroom without buying food and food stamp only covered for 10 days food because I have to buy ready halal food and I spent \$3 for water per day and I feed the pigeon too every morning to buy rice using my credit card sometime because according to Islam the animal pray for the people who feed them so sometime I buy rice for the pigeon as part of religion to feed the animal which outside and considered my personal expenses but I will be able to buy my personal expenses if I don't lose my job and respondent did not premeditated undue hardship had cost me constructive discharge on 04/09/2022 and all of it "but for" the respondent premeditated undue hardship on my religious discrimination which cause me constructive discharge by forced me to leave Islam as my religion when Sgt Rodriguez said comeback tomorrow if choose job first also the same way he said comeback tomorrow if leave Islam because in Islam prayer is like head in the body according to Islam religion.
5. Hotel room charges after September 19, 2024 "but for" NYPD refused my eviction complaint and made force me to stay on the street and train and have to book the hotel for religion purposes have to take shower if I was peeing on my self and I wanted to tell the truth I cannot take the street sometime when I ride the train at midnight I cannot stand the train because some of the homeless was smoking inside the train and I book the hotel because of frustration but I did not peeing on myself but the situation surrounding made me book the hotel for safety and my health too I cannot sleep surrounding homeless who curse and having sex on the subway at midnight and sometime I saw some homeless trying to steal the drunk man wallet on the train by

reaching his pocket and has made me book the hotel because something I felt bad I was not able to protect that drunk man when the homeless reaching his pocket but I realize I just a woman not able to protect the man and made me feel I have to book the hotel without peeing on myself but I try not to take advantage of this I will book the hotel only when the condition was horrible made me book the hotel to made me feel better and stay on the street again the next day but if I have peeing on myself I must book the hotel in order to clean my self in order to be allowed to pray.

VII. PLAINTIFF'S CERTIFICATION

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

January 6, 2025

Dated

[Signature]

Plaintiff's Signature

ERICA

First Name

Middle Initial

FEBRIANTI

Last Name

Homeless

Street Address

County, City

929 615 1758

State

Zip Code

Telephone Number

ericafebrianti60@gmail.com

Email Address (if available)

I have read the attached Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

FEBRIANTI V NYC HEALTH + HOSPITAL 23CV06175
FEBRIANTI V STARWOOD Worldwide 75CV06175

FEBRIANTI, ERICA

Name (Last, First, MI)

Homeless

Address

City

State

Zip Code

Telephone Number

E-mail Address

January 6, 2025

Date

Signature

Erica.febrianti60@gmail.com

Return completed form to:

Pro Se Intake Unit (Room 200)
 500 Pearl Street
 New York, NY 10007

